

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

UNITED STATES OF AMERICA

§

v.

§

CRIMINAL NO. 5:22-CR-226

ROBERTO ADAMS

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§

STIPULATION OF FACT

The United States of America, by and through Jennifer B. Lowery, United States Attorney for the Southern District of Texas and Heather Winter, Assistant United States Attorney, and the defendant, **ROBERTO ADAMS**, and the defendant's counsel, hereby stipulate as follows:

I.

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

The United States Department of Agriculture Office of the Inspector General (USDA-OIG) and Federal Bureau of Investigation (FBI) conducted a joint public corruption investigation into ROBERTO ADAMS ("ADAMS"). ADAMS retired from USDA on December 17, 2021, after 10 years of service as a Lead Animal Health Technician. While employed with USDA, his duties included the examination of all cattle entering the United States through the Laredo Port of Entry. If a live tick is found on a cow/bull, the entire load must be quarantined for a 7–14-day period before being able to be presented again. If any other illness is found on the cow/bull, only that animal is denied entry to the United States; the rest may enter. ADAMS misused his official position with USDA and accepted bribes to allow tick infested cattle to enter the United States.

Specifically, on January 8, 2021, the USDA-OIG received an anonymous complaint on its hotline alleging that ADAMS was allowing tick infested cattle to enter the United States without properly inspecting them. The anonymous complainant believed, but did not provide proof, that ADAMS was doing this on behalf of Mexican cattle brokers in return for financial, or some other form of compensation.

On March 16, 2021, an allegation was also made by a cattle broker at a USDA, Animal, Plant, Health Inspection Services' stakeholders engagement meeting that a Laredo-based USDA Animal Health Technician named "ROBERTO" was accepting \$200 bribes to allow cattle with live dry ticks into the United States.

On March 23, 2021, this cattle broker was interviewed by investigators. He told investigators that Mexican cattle brokers have been paying bribes to ADAMS on a regular basis. The cattle broker identified the Mexican cattle broker who had paid bribes to ADAMS and agreed to make a recorded call to the Mexican cattle broker to question him about ADAMS. A recorded phone call was made on November 29, 2021, wherein the Mexican cattle broker described ADAMS and the bribery scheme.

In the summer of 2021, investigators recruited a Confidential Human Source (CHS-1) with regular and direct access to ADAMS. CHS-1 informed agents that in the past 2-3 years, the number of ticks found by ADAMS had greatly decreased. Further, in addition to his personal and government issued cell phones, ADAMS began using a third cell phone in and around 2020. On this cellular phone, ADAMS only spoke in Spanish. On multiple occasions in August and September 2021, ADAMS would make and receive calls on his third cell phone any time any load of cattle was denied entry into the U.S.

On November 19, 2021, agents executed a federal search warrant issued in Laredo, Texas to seize ADAM's third cell phone and extract its contents. ADAMS was also interviewed in a non-custodial setting.

During ADAMS's interview, he admitted to receiving bribes from Mexican cattle companies for allowing cattle to illegally enter the United States. ADAMS admitted he was voluntarily accepting bribe money to allow cattle to enter the United States through the use of his official position as a USDA employee. ADAMS began accepting bribe money and accepted bribes from Mexican cattle brokers for approximately 14 months. This arrangement consisted of accepting bribe money in exchange for allowing cattle into the United States. In exchange for money, ADAMS allowed cattle with ring worms, wet castration, cows that were coughing and had mucus to enter the United States. These cattle would have otherwise been denied entry to the United States. ADAMS would allow cattle with dry ticks into the country, but not cattle with live ticks.

A review and translation of WhatsApp messages on ADAMS's phone revealed messages sent from apparent cattle brokers informing ADAMS when their cattle would be coming through the Port of Entry. ADAMS assured them their cattle would get through. ADAMS also discussed receiving payments via text message. Multiple messages included ADAMS sending his banking information for payment.

USDA Animal Health Technicians are not allowed to accept gifts or bribes as part of their official duties. Additionally, there is no reason related to official business for Mexican cattle export entities to wire money directly to an Animal Health Technician's personal bank account. The parties agree that ADAMS received between \$40,000 and \$95,000 in wire transfers to his personal

bank account from cattle brokers for allowing cattle into the U.S. without proper quarantine or inspection.

II.

Defendant, **ROBERTO ADAMS**, hereby confesses and judicially admits that from in or around March 2019 to in and around November 2021, as a public official, he did directly and indirectly, corruptly demand, seek, receive, accept and agree to receive and accept personally a thing of value, namely United States Currency, as influence for the performance of an official act, and in return for and with the intent of being induced to act and omit to do an act in violation of his official duty, in violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

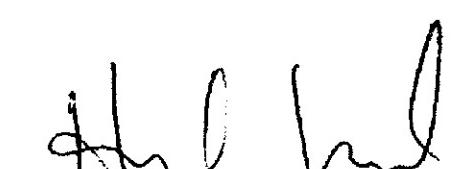


ROBERTO ADAMS
Defendant

APPROVED:

JENNIFER B. LOWERY
UNITED STATES ATTORNEY

By:



Heather Winter
Assistant United States Attorney



Philip Del Rio
Attorney for Defendant